

The Federal Communications Commission (FCC) is requesting comments on the impact that communications towers, such as those that support TV and radio stations and cell phone service, are having on migratory birds. There are more than 138,000 towers registered, and so far their presence has proven lethal to millions of migrating birds. Many songbirds migrate at night and are killed after colliding with these towers, particularly during periods of fog, rain and low-cloud ceilings. Tower height, placement, lighting and the presence and placement of guy wires seem to influence mortality levels, but a great deal still remains unknown about the impact of tower strikes on each bird species. Not surprisingly, the communications industry has been largely unconcerned about the problem, but as bird mortality rates rise, wildlife advocates are asking the FCC to take notice and make changes.

I ask that the FCC take action to protect migratory birds, and specifically take action to:

- begin a systematic review of communication tower and bird mortality issues;
- institute a research program, funded by the communications industry, to identify tower placement, design and lighting conditions that result in bird mortality;
- undertake environmental reviews of all existing towers to assess their placement and design with regard to migratory bird impacts;
- require that all proposed towers be subjected to rigorous environmental reviews;
- and implement immediate protections based on existing knowledge, such as the voluntary tower siting and placement guidelines developed by the U.S. Fish and Wildlife Service.

Thank you